SeaCast, Inc.

RCRA Compliance Evaluation Inspection

WAD 98176 9805

January 31, 2012

Report Information

Report Author Name (printed): Cheryl Williams/Jack Boller

Report Author Signature and Date: Cheryl Williams 3/21/2011
Jack Boller 3/22/2011

Peer Reviewer Name (printed): Kristie McNeill

Peer Reviewer Signature and Date: 3/22/12

Contents

Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection, and from a call with Mr. Truscott on March 19, 2012. The information provided does not constitute a final decision on compliance with RCRA regulations nor does it claim to be a comprehensive summary of all activities and processes conducted at the facility.

EPA Region 10
RCRA Compliance Inspection Report
Section A

Inspection Information

Handler Name: SeaCast, Inc.

Handler ID Number: WAD 98176 9805

Inspection Date: January 31, 2012

Inspection Type: Compliance Evaluation Inspection

Inspection Team: Jack Boller, EPA
Cheryl Williams, EPA
Valerie Streeter, Tulalip Tribe
Steve Dellino, Snohomish County

Site Contact Information

Site Contact Name/Title: Michael Robins, President

Site Location Address: 6130 31st Avenue NE, Marysville, Washington 98271

Site Mailing Address: Same as above

Site Phone Number: 360-653-9388

Site Fax Number: 360-653-6044

Latitude/Longitude: 48.052194, -122.191258

*See Section B for database information and narrative reflecting these changes

Section B: General facility Information

Site Location:

The facility is located in an industrial park on the Tulalip Reservation near Marysville, Washington. It consists of a small one story office building and two large industrial process buildings. There is also an outdoor storage area where various products and equipment are stored.

Mailing Address:

The facility site location and mailing address were confirmed during the inspection and are listed in Section A of this report.

Owner/Operator Information:

SeaCast is located within the exterior boundary of the Tulalip Reservation on fee land. It is a privately (non-tribal) owned and operated facility. According to facility personnel, SeaCast is not a major tribal employer.

Regulatory Status:

A search of RCRAInfo showed the facility is listed as a large quantity generator of hazardous waste. Information gathered during the inspection confirmed the large quantity status.

The EPA has never conducted a compliance inspection at this facility. Compliance assistance visits have been performed by other program offices of EPA and by the State RCRA program. On November 22, 2002, an inspector with the Department of Ecology conducted a compliance assistance visit. At that time the inspector suggested that the facility needed to consistently mark and label drums of waste, and otherwise properly manage containers. The inspector also mentioned that both sandblast grit and the quench water should be analyzed for the RCRA eight metals.

Section C: Facility History

The facility is an investment casting company that casts metal products from various alloys of steel. They have customers all over the world. Their products range from assorted metal parts for the aerospace industry to the casings for the Olympic torches. The process begins with making a wax model of the part to be manufactured. The wax model is then coated with a sand/silica ceramic material to form the mold that is used to make the casting. Once the ceramic is hardened, it is heated to melt out the wax. Molten metal alloy is then poured into the heated mold. Once the metal is cooled and solidified, the mold is removed, and the part is cleaned with molten sodium hydroxide and polished. There is little machination of the processes conducted at this facility, most work is conducted by hand.

D: Description of Inspection

Purpose: The purpose of the inspection was to evaluate the facility's compliance with 40 C.F.R. Part 262 standards for hazardous waste generators, 40 C.F.R. Part 273 universal waste management standards, and 40 C.F.R. Part 279 requirements for management of used oil.

Inspection: On January 31, 2012, at 9:00 a.m. the inspection team arrived at the SeaCast facility west of inter-state highway 5 near Marysville, Washington. The EPA inspectors were accompanied by Valerie Streeter of the Tulalip Tribes and Steve Dellino of the Snohomish County Public Works Department. Jack Boller led the inspection for EPA and Cheryl Williams provided back-up support.

We entered the facility and identified ourselves to the receptionist. Mr. Boller explained to the receptionist that our purpose was to conduct a hazardous waste inspection. She immediately connected us with Mr. Ben Truscott, the Safety Director for the company, who was our contact throughout the inspection, which included the paperwork/file review.

We began the inspection with a short in-briefing. We presented our credentials to Mr. Truscott and told him that we were there to conduct a hazardous waste inspection. Mr. Truscott gave us a description of the process and identified the waste streams generated at the facility. He said that the facility generates several wastes which include:

a) A corrosive hazardous waste sodium hydroxide that he said had a pH of 13. The sodium hydroxide was generated from parts cleaning and was designated by the facility as characteristic hazardous waste D002;
b) Oils from pumps and cooling systems. Mr. Truscott told us that typically this oil was managed as waste oil and not used oil;
c) A corrosive hazardous waste from an acid bath that was used to clean the residual wax from molds. Mr. Truscott said that the acid bath had a pH of 1 and further explained to us that the acid is neutralized in the wash tank and is discharged to the City of Marysville sewer system under permit;
d) Aerosol cans; and
e) Spent fluorescent lamps.

Mr. Truscott explained to us that all of the hazardous waste that is not discharged under permit to the City of Marysville, is shipped off site through Philip Services.

Photo 1: Muriatic acid under tank

Mr. Truscott then led us on a tour of the facility. We looked at the various production areas starting with the acid wash room. The acid wash room is located in a small shed adjacent to the main production building, outside the wax room. Two acid tanks, containing muriatic acid, were located on the left side of the room and one was located at the right, back side of the wax room. Mr. Truscott again explained that the acid baths were used to remove the soluble wax from the castings. Mr. Truscott said that when the muriatic acid is too dirty to use, it is neutralized to a pH near 5 with soda ash and discharged to the sewer under a permit to the city of Marysville. He explained that the neutralization (treatment) is conducted in the same tanks as the acid wash, thus the contents of the tanks change between muriatic acid (product) and muriatic acid (waste). The tank did not have any risk or hazardous waste labels on them. We observed dark staining and liquids on the floor of the secondary containment around the tanks (photo 1). Mr. Truscott said that the secondary containment was not cleaned on any regular basis. We did not observe any evidence of cracking in the secondary containment for these tanks. Ms. Williams asked if it was OK to take photographs during the site tour and Mr. Truscott confirmed that it was.

Our next stop was the shell room where the wax models are made and encased in the silica ceramic. Mr. Truscott explained that when the shells are completed, the wax is melted out. The melted wax is collected and reused to make more models.

On our way from the shell room we paused briefly to observe a "pour." Hot silica molds were removed by hand from a large furnace, carried across the room where molten metal was poured into the molds (again by hand), and then the molds were carried to a tray of sand where they were placed to cool.

We moved on to the sodium hydroxide tank that Mr. Truscott called the Kolene tank. Mr. Truscott explained that sodium hydroxide is heated to 1800° F, at which point the sodium hydroxide is molten. The molten sodium hydroxide is used to clean any residual silica mold residues from the ports of the casted items. Mr. Truscott explained that any residues that rose to the top of the unit were skimmed off by hand and pushed to a chute that collects the molten sodium hydroxide mixed with the silica residues on a tray at the bottom of the unit. Once the molten sodium hydroxide mixture is collected on the tray, the tray is pulled back releasing the molten material from the tray into a 55 gallon container located in a closed compartment under the tank at the end of the unit. We asked to see the container which was used to collect the waste. Mr. Truscott opened the compartment. We observed that the 55 gallon drum had no labels or other markings on it that would indicate the contents were hazardous waste. Ms. Williams mentioned this and Mr. Truscott explained that the waste going into the drum is so hot (about 1000° F) that any labels on the drum would burn off as soon as the hot waste was added. Mr. Truscott stated that once a drum was full and ready to be removed from under the Kolene tank it was their regular practice to place a label on the drum and also label the drum with an accumulation start date. When asked by Ms. Williams how long it took to fill a drum, Mr.

Truscott said that one 55 gallon drum is generated about once each week and that each drum weighs approximately 800 pounds. He told us that the waste had high levels of nickel and chromium.

Mr. Truscott then took us to another area located outside the main building, just beyond the Kolene unit. In this area, we observed a line of conex shipping containers that Mr. Truscott said were used for storing various materials. He took us to one of the shipping containers that was being used to accumulate solid (non-liquid) hazardous waste, specifically the sodium hydroxide sludge from the Kolene Unit. We observed eight 55 gallon drums inside of the shipping container, which Mr. Truscott confirmed was the waste from the sodium hydroxide (Kolene) tank. These drums had been placed on two pallets (four drums per pallet) and each pallet of four drums was shrink-wrapped. Mr. Truscott told us that Philip Services Corporation (PSC) had picked up some of this waste on January 30, 2012, the day before the inspection.

Photo 2: Sodium hydroxide waste in conex

The containers of sodium hydroxide (Kolene) waste were placed in the conex box in such a way that it was not possible to observe all sides of the containers (photo 2). The pallets were placed one behind the other and pushed as far back into the left corner of the conex box as possible. There was no space between the two pallets. Between the pallets and the right side of the conex, odd pieces of equipment were placed against the wall. These pieces of equipment were less than 30 inches from the pallets containing the drums of hazardous waste.

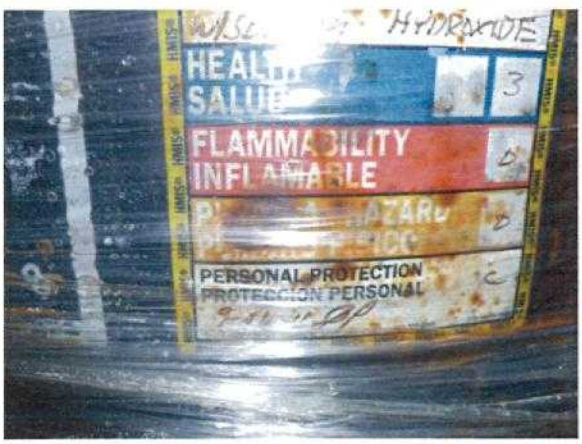

Photo 3: Label on sodium hydroxide drum

It was difficult to read the labels on the drums that we could get close enough to inspect because the plastic shrink wrap covered the labels. We were, however, able to see that the drums had hazard labels on them and start dates written on the hazard labels (photo 3). It appeared to us, from what we could see, that the containers were not marked with the words "hazardous waste." We also observed that one drum was dated 9/16/11 and a second one was dated 9/26/11. We pointed this out to Mr. Truscott and he said that he did not know why Philip did not take these drums when they were at the facility the previous day and stated he did not know why they (Phillip) had not done "first in, first out."

We looked around the container to see if there was any emergency communication equipment available. There was not. There also was not any emergency communication telephone/contact numbers located in this area.

From here we moved back inside the building to the finishing area. In the finishing area, we observed multiple alumina grit sand blasting units and a tumble blaster. Mr. Truscott told us that these units were used for polishing parts. Mr. Truscott said that the spent grit is sent to a solid waste landfill. We asked if it had ever been tested to determine if it was hazardous. He said he did not think it had been. On March 19, 2012 we conducted a follow-up conference call with Mr. Truscott to find out if he had received analytical results from testing the sandblast grit. Mr. Truscott told us that the sandblast grit failed TCLP at 18.9 mg/l chromium.

Photo 4: Used oil collection container under vacuum pump

Our next stop was the heat treat area, where parts are heated to harden and cure them. The unit includes an oil bath quench unit. According to Mr. Truscott, the spent oil is sent through an oil water separator. The oil is then sent off site as waste oil. We also observed a vacuum heat treat furnace. Mr. Truscott said that this unit uses a propylene glycol antifreeze as a coolant. He said that used coolant is sent offsite as waste. Under the vacuum pump for this unit, we observed a 5 gallon pail used for collecting used pump oil that is released from the pump (photo 4). Mr. Truscott confirmed that the oil in this 5 gallon pail was considered "used oil." The container was not labeled. When we asked Mr. Truscott how the used oil was managed he said that it is put in the same unit as the oil from the oil bath quench unit and is run through the oil water separator.

Photo 5: Building 2 accumulation area

We walked through the machine shop. Mr. Truscott said that coolant and cutting oils are sent off site as waste oil.

We continued the facility tour in Building 2. Mr. Truscott told us that the facility's second hazardous waste accumulation area was located in this building (photo 5). He told us it differed from the accumulation area in the conex by type of waste. The accumulation area in Building 2 was used to manage liquid wastes. The Building 2 hazardous waste accumulation area was partially fenced (on three sides). Inside of this accumulation area, there was an assortment of containers ranging in size from approximately one quart to large plastic totes. There was no way to enter this area to conduct an inspection of the containers without rubbing up against a blue, plastic 55 gallon container (blue container on the left in the photo above) that Mr. Truscott told us contained sodium hydroxide. There was a powdery material on the surface of the container that Mr. Truscott told us was the sodium hydroxide (what remained when the liquid sodium hydroxide on the lid of the container evaporated). He warned us to be careful not to touch the dried sodium hydroxide with our bare hands or other bare skin. The container was labeled with a

hazard label that indicated the contents were corrosive and from the Kolene tank but there was no "hazardous waste" label on the container as required. Mr. Truscott told us this waste from the Kolene tank was different from the waste in the conex because this was quench water, not the cooled and now solid sodium hydroxide.

The remainder of the containers had been placed in this area in such a way that there was no aisle, making it difficult to thoroughly inspect the area in a safe manner (i.e., without walking on pallets and stepping over containers). Based on what we could observe, it appeared that none of the containers were marked with the words "hazardous waste" though some of the containers had hazard labels with dates on them, and some were dated. Mr. Truscott told us that not everything in this accumulation area was a hazardous waste and that the items that were not a hazardous waste were put in this area because it seemed the safest way to manage them.

Photo 6: Universal waste tubes in Building 2 accumulation area

In the back corner of the fenced accumulation area we observed several boxes of fluorescent lamps/tubes (photo 6). These tubes were in four foot long cardboard boxes that were placed upright (perpendicular to the floor) in a large wooden box; all of the boxes were open. At least one box contained tubes that were longer than the box and one of the boxes had a broken tube in it. Inside the top of the wooden box a grid had been created using 1x1 dimensional lumber to create supports of the boxes of lamps to remain upright. On the exterior of the wooden box, facing the back fence of the area, the words "Used Bulbs" had been spray painted in black letters. Mr. Truscott confirmed that all the lamps in the wooden box were used. We did not observe start dates on any of the cardboard boxes and Mr. Truscott said that they did not have a record of when accumulation had begun.

Photo 7: Three 55 gallon containers in back of Building 2 accumulation area

Toward the middle of the back of this hazardous waste accumulation area, we observed three 55 gallon containers (photo 7). Two were blue plastic drums and one was a black metal drum. The words "drain water" had been written in marker on one of the blue containers. There was no other information on the container. If this container held hazardous waste, there was no accumulation start date or the words "hazardous waste" on the container. The second blue container had a hazard label on the side. On the top of the hazard label the words "Vacuum Heat Exchanger Coolant" were written. Neither the words "hazardous waste" nor an accumulation start date, were on this container. The black metal container had a blank hazard label on its side but no other markings, labels, or an accumulation start date were observed. Mr. Truscott did not know the contents of this container.

Photo 8: Containers of used battery acid

At the middle of the left side of the accumulation area, we observed a blue plastic 5 gallon bucket that contained at least six smaller plastic bottles (photo 8). We did not remove the plastic bottles for closer inspection, but it appeared that at least three of the bottles were labeled with the words "used battery acid" on masking tape. A piece of masking tape crossed the top of the blue bucket. The words "used battery acid" were written on the tape. At least some of the plastic bottles had hazard labels on them, but we could not see any accumulation start dates or the words "hazardous waste" on any of the individual bottles or on the five gallon bucket.

There were many more containers and other materials in this area, but a complete inventory was not conducted due to safety (trip/fall) and space issues.

We did not observe any emergency communication equipment in the vicinity of the accumulation area, nor did we observe any emergency numbers posted in the area.

Photo 9: Aerosol can puncture unit

Across the walkway from the fenced hazardous waste accumulation area, in Building 2, we observed a puncture unit for aerosol cans (photo 9). It was mounted on a 55 gallon drum. Mr. Truscott said that they managed the container as satellite accumulation and the punctured cans as scrap metal. The drum did not have a hazardous waste label on it, nor did it have an accumulation start date. Mr. Boller asked about the charcoal filter in the vent for the drum. Mr. Truscott said that the filter was changed out every six months. We discussed with Mr. Truscott that puncturing aerosol cans was a form of treatment and that treatment is not allowed in satellite accumulation areas.

Outside of the fenced area, we also observed a drum that was labeled "used oil." Mr. Truscott said that it was oily water that would be sent to Emerald Services for fuel blending.

We left Building 2 and inspected additional outside storage areas. None of these areas were used to manage hazardous waste. We observed drums and other containers of product, equipment, and several conexes that held products. We observed an area for used oil collection. Mr. Truscott again said that all used oil from the facility is picked up by Emerald.

On our way back to the office, we passed through the maintenance shop. There we observed a drum containing used oil. It was labeled with the words "used oil."

File Review

We conducted a file review. We asked to look the following documents: sandblast grit profile, manifests for the past 12 months, training records, a facility map, inspections logs, profiles for the waste from the Kolene tank, and the Material Safety Data Sheets (MSDSs) for various products/wastes we had observed during the site tour. We reviewed manifests for 2011, inspection logs since 2006, training records, and waste profiles. We noted the following issues:

- Initially, the manifest file did not have return copies, but Mr. Truscott found them in the invoice file.

- The inspection log documented 13 weekly inspections that had been conducted since 2006. These inspections were dated August 1, 2006; November 2, 2006; February 3, 2009; April 2, 2009; May 15, 2009; August 17, 2010; December 20, 2010; January 5, 2011; April 26, 2011; July 25, XXXX; October 6, 2011; August 24, XXXX; and January 9, 2012. Mr. Truscott confirmed that no other inspections had been conducted. Copies of the 2011 and 2012 inspection logs are included in the report as Attachment D.

- We verified with Mr. Truscott that they did not have a waste profile for the sandblast grit and had made no hazardous waste determination (generator knowledge).

We concluded our inspection with a closing conference and left the site at 11:30 a.m.

Closing Conference

A closing conference was held with Mr. Truscott and the owners of SeaCast, Michael Robins and Bert Robins. SeaCast's environmental consultant, from RG Environmental was on the phone. We discussed several of the issues that we observed during the inspection.

1. There was less than 30 inches of aisle space in both of the hazardous waste accumulation areas.

2. At least some, if not all, of the containers in the outside "dry" hazardous waste accumulation area had been generated more than 90 days prior to the inspection.

3. The fluorescent lamps were not in closed containers and were not labeled with the words "universal waste" or accumulation start dates. We were not made aware of any other way the facility was using to track the accumulation start date for the lamps.

4. Several containers of hazardous throughout the facility were not labeled with the words "Hazardous Waste" or the accumulation start dates, consistent with the regulations.

5. We discussed the aerosol can puncture unit and how treatment of hazardous waste can only be done by generators under certain conditions.

6. Weekly inspections were generally not being conducted and documented. For those that were documented, not all inspection logs were signed and dated, and there was no information that problems that were documented had been fixed.

7. They need to make a determination whether various wastes at the facility, including the sandblast grit, are hazardous waste.

8. We had not observed emergency communication equipment or posted emergency numbers in the hazardous waste accumulation areas.

Attachment A: Photo Log

Unless otherwise noted, all photographs were taken on January 31, 2012 by me, Cheryl Williams, using a Panasonic FH25 Lumix digital camera. Photographs were downloaded from the camera to the hard drive of my computer and then copied to a CD. No editing or other manipulation of the photographs has occurred.

Signed: Dated:

Cheryl Williams 3/21/2011

P1000084.jpg Muriatic acid under tank in acid wash room
P1000085.jpg Muriatic acid under tank in acid wash room
P1000086.jpg Sodium hydroxide waste in conex
P1000087.jpg Close up of label on drum of waste sodium hydroxide in conex
P1000088.jpg Close up of label on drum of waste sodium hydroxide in conex
P1000089.jpg Used oil collection container under vacuum pump
P1000090.jpg Used oil collection container under vacuum pump
P1000091.jpg Waste accumulation area in Building 2
P1000092.jpg Overview of left side of Building 2 waste accumulation
P1000093.jpg Containers of used battery acid
P1000094.jpg Overview of front, right side of Building 2 waste accumulation area
P1000095.jpg Three 55 gallon containers in back of Building 2 waste accumulation area
P1000096.jpg Three 55 gallon containers in back of Building 2 waste accumulation area
P1000097.jpg Overview of back, right side of Building 2 waste accumulation area
P1000098.jpg Universal waste tubes in Building 2 waste accumulation area
P1000099.jpg Universal waste tubes in Building 2 waste accumulation area
P1000100.jpg Universal waste tubes in Building 2 waste accumulation area
P1000101.jpg Wooden box holding universal waste tubes in Building 2 waste accumulation area
P1000102.jpg Aerosol can puncture unit
P1000103.jpg Aerosol can puncture unit
P1000104.jpg Container of used oil generated from air compressor
P1000105.jpg Containers of used oil stages to be picked up by Emerald


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P1000102.JPG


P1000103.JPG

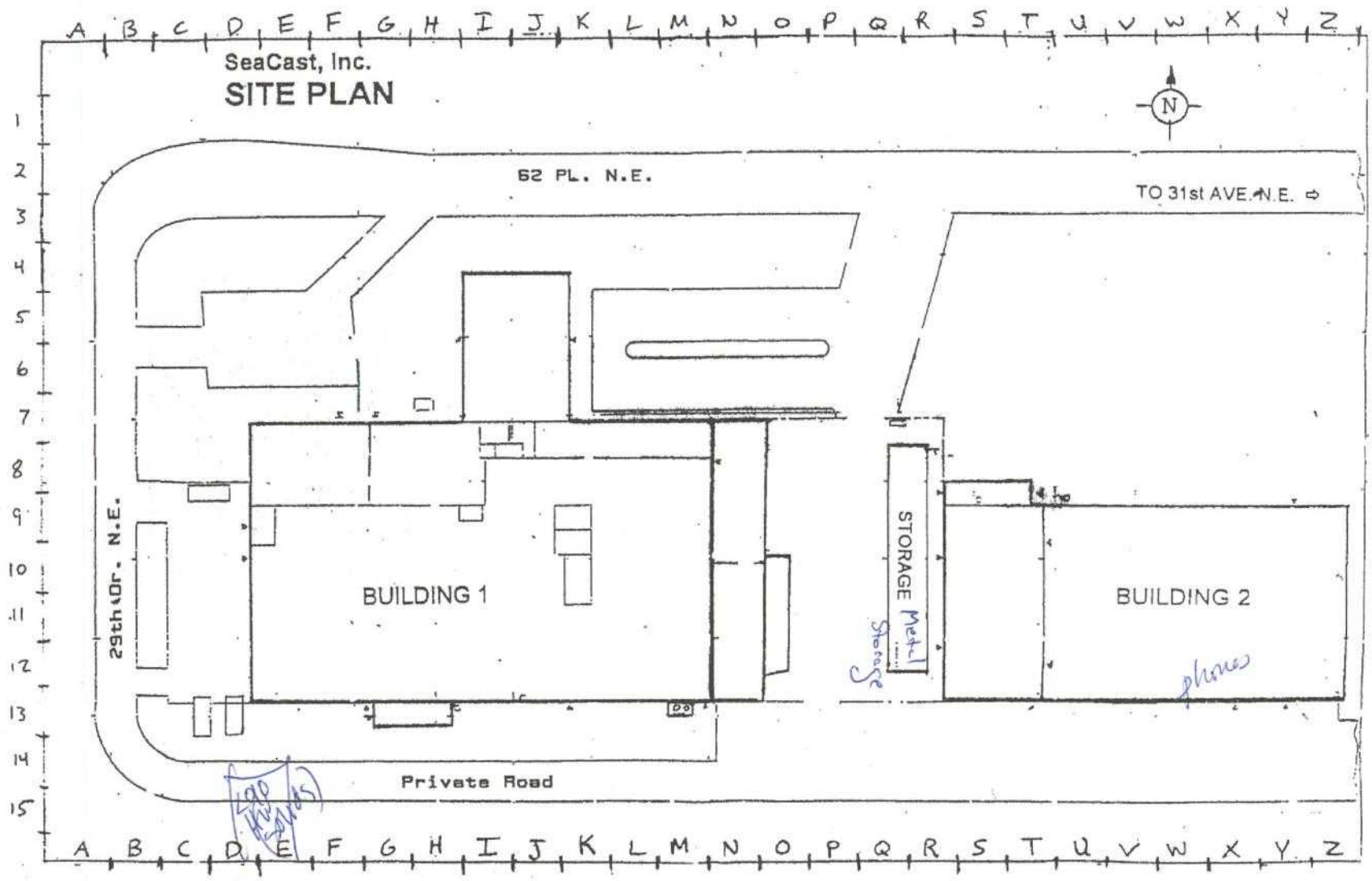

P1000104.JPG


P1000105.JPG

Attachment B: Facility Maps

Map 1: SeaCast Site Plan
Map 2: SeaCast Building 1
Map 3: SeaCast Evacuation Route/ Building 2

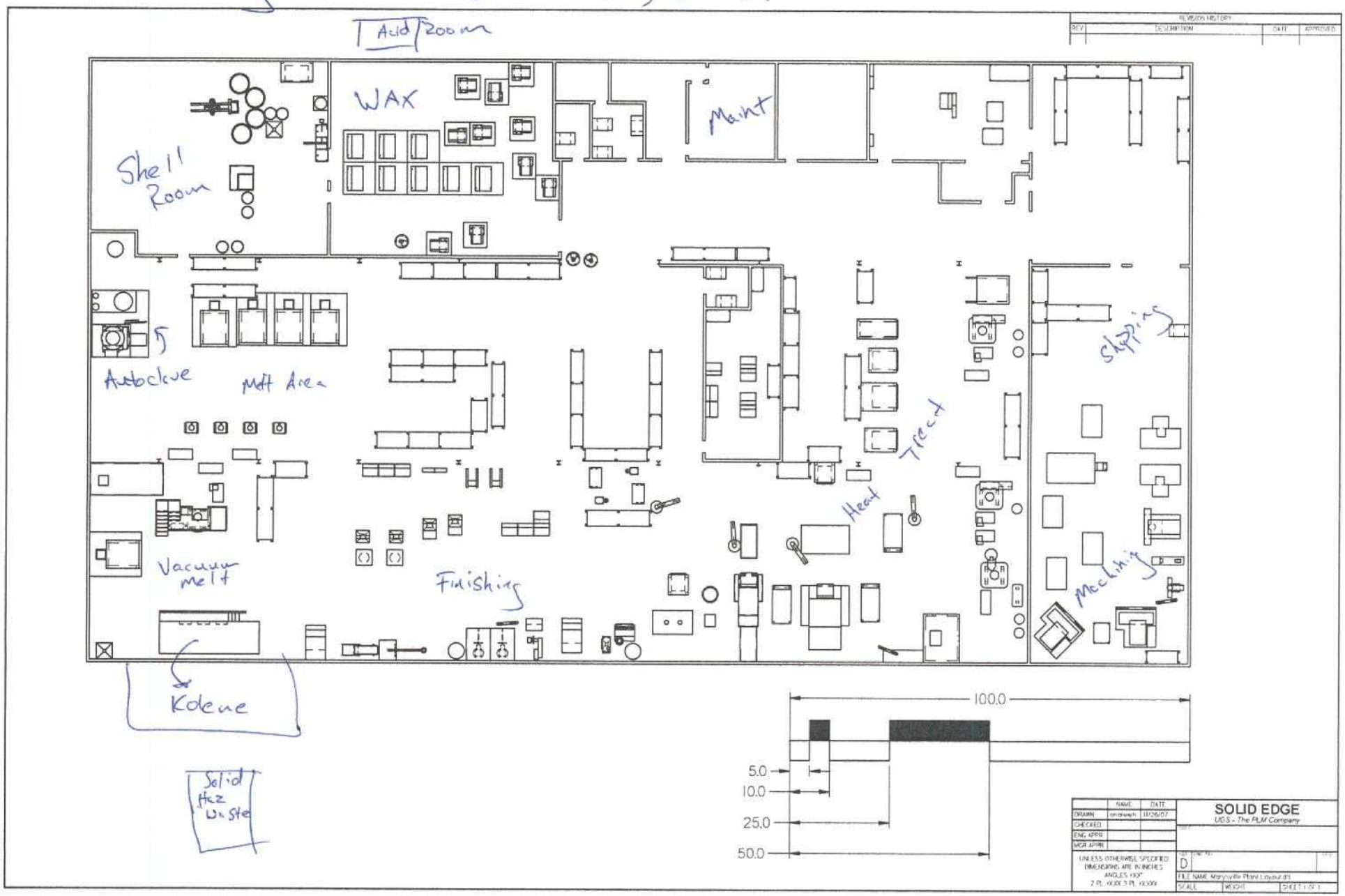
Seacast 1/31/12
CW



Attachment B:
SeaCast, Inc.
WAD 981 969 805
2012 RCRA CEI Inspection

MAP 1

Building 1 - SeaCast, Inc.



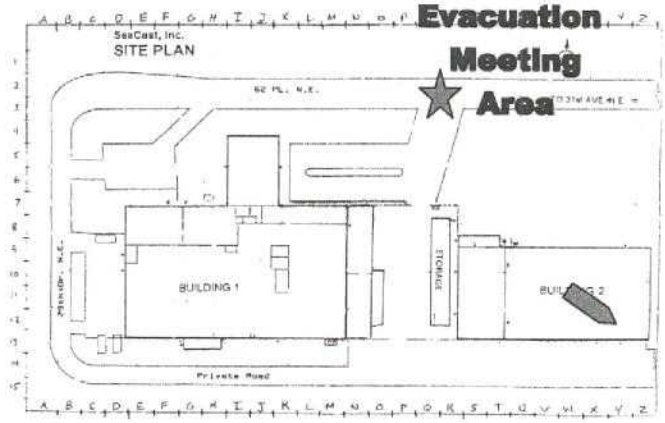
Attachment B
SeaCast, Inc.
WAD 981 76 9805
2012 RCRA Inspection

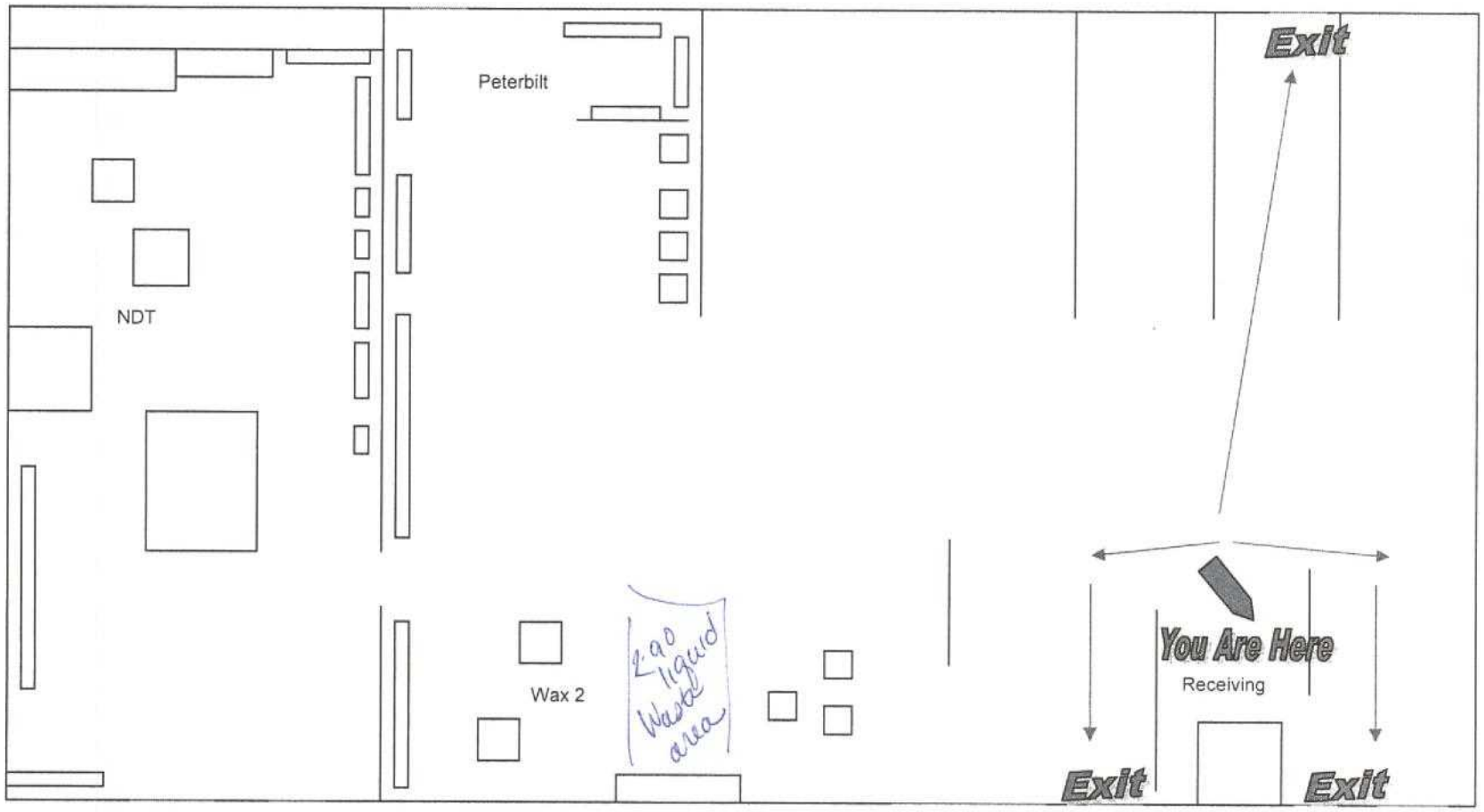
MAP 2

Accept 1/31/12

SeaCast Evacuation Route

Recieving





Seacast 1/31/12

Attachment B
SeaCast, Inc.
WAD981769805
2012 RCRA CEI inspection MAP 3

Attachment C: RCRAInfo Compliance Inspection Report

EPA Region 10 RCRA Compliance Inspection Report

Handler Name: SEACAST, INC.

Handler ID Number: WAD 98176 9805

Inspection Date:

Inspection Type:

Site Contact Name: BEN A TRUSCOTT

Site Location: 6130 31ST AVENUE NE MARYSVILLE, WA 98271

Site Mailing Address: 6130 31ST AVENUE NE MARYSVILLE WA 98271

Contact Phone Number: 3606539388 5149

Inspection Team:

Report Start Date:

Report Author Name (print) :

Report Author(signature) : **Date :**

* See section B for more information

Source of Current Data: unknown
Land Type: Indian Country

Date Received: 06/03/2010
Non-notifier: No

Owner Information

MICHAEL ROBINS
6130 31ST AVENUE NE MARYSVILLE WA 98271 phone: 3606539388

Operator Information

MICHAEL ROBINS
6130 31ST AVENUE NE MARYSVILLE WA 98271 phone: 3606539388

Hazardous Waste Activity Information

Generator status: large quantity generator
Used Oil: no
Universal waste: no
Importer: no
Onsite burner exempt: no
Underground injection: no

Transporter: no
SNC: no
Recycler: no
Mixed waste generator: no
Furnace exempt: no

Waste Codes (from unknown, received 06/03/2010. Number of waste codes reported: 3)

D002 D007 D011

TSDF Indicators (l = land disposal i - incinerator b = BIF s = storage t = treatment)

Operating TSDF: no
Permit Progress: no
Closure Workload: no
CA Workload: no

Full Enforcement: no
Permit Workload: no
Postclosure Workload: no
Subject to CA: no

List of Permit Units no permit units found

NAICS Codes: 331512 331524 332811 33271

Facility History

Complete SNC Inspection History	no SNC inspections found
Other Inspections Since 1/1/2007	no inspections found
Violations Since 1/1/2007	no violations found
Enforcements Since 1/1/2007	no enforcements found

Attachment D: Facility Weekly Inspection Logs

Facility Waste Inspection Sheet for dates:
January 9, 2012
Undated
October 6, 2011
August 24, XXXX
July 25, XXXX
April 26, 2011
January 5, 2011

Seacast 1/31/12 CW
8 pgs Facility waste inspctr Sheets.

Facility Waste Inspection Sheet

Safety Equipment

Yes Are all spill kits stocked?
Yes Is the first aid cabinet stocked?
Yes Is the emergency shower and eye wash station functioning properly, and properly documented?
No Is the emergency response information posted near all communication devices?
Yes Are fire extinguishers charged, and properly documented?

Waste Accumulated

Shipping Name	Profile #	Count	
Ceramic Material with Sodium Hydroxide	113556-05	6	
Ceramic Material with Sodium Hydroxide (Overpack)	113556-05		
Kolene Cleanout Solids	307530-02	2 Totes	
Kolene Filters	312429-02		
Non Regulated Quench Oil and Water	312428-02	1½ Drums	
Kolene Overflow Water	341064-00	24	+1 Tote
Used "MPI" Oil	341063-00		
Used Penetrant	341057-00		
Water Based Coolant Lubricant	301555-02		
Oil/Water from NDT Parts Washer	338491-00		
Oil Contaminated Pads and Rags	332400-00		
Latrix 6200 Wax Pattern Cleaner	312624-00		
Parts Washer Solution (Heat Treat)	334031-01	3	
Autoclave Condensate	449333-00		
Vacuum Heat Exchange Coolant	449334-00	2	
Neutralized Kolene Overflow	450025-00	1	
Waste Oil with Water	113554-05		

Yes Are all drums and containers marked with a hazardous waste label?
Yes Are all drums and containers marked with a risk label?
Yes Are all drums marked with accumulation start date?
Yes Are there any drums that are near, or have exceeded the 90/180-day time frame?
___ Are all drums marked with proper waste codes?
Yes Are all containers closed?
Yes Is all labeling visible and readable?
No Are all drums and containers in good condition, no leaks, dents, or rust?
Yes Is the secondary containment free of cracks or other failures?
Yes Secondary containment does not have any liquids in it?
No Is their 30 inches of aisle space between rows?

Comments (Describe the actions taken to correct deficiencies noted above, and date action was taken.):

Name [signature] **Signature** [signature] **Date** 1-9-12

SeaCast, Inc.

Attachment D:
SeaCast, Inc
WAD 981 769805
2012 RCRA CEI Inspection

Page 1 of 1

Facility Waste Inspection Sheet

Safety Equipment

✓ Are all spill kits stocked?
✓ Is the first aid cabinet stocked?
No Is the emergency shower and eye wash station functioning properly, and properly documented?
Yes Is the emergency response information posted near all communication devices?
No Are fire extinguishers charged, and properly documented?

Waste Accumulated

Shipping Name	Profile #	Count
Ceramic Material with Sodium Hydroxide	113556-05	12
Ceramic Material with Sodium Hydroxide (Overpack)	113556-05	
Kolene Cleanout Solids	307530-02	
Kolene Filters	312429-02	
Non Regulated Quench Oil and Water	312428-02	1
Kolene Overflow Water 250 Tote	341064-00	1
Used "MPI" Oil	341063-00	1/4 Drm
Used Penetrant	341057-00	
Water Based Coolant Lubricant	301555-02	
Oil/Water from NDT Parts Washer	338491-00	
Oil Contaminated Pads and Rags	332400-00	
Latrix 6200 Wax Pattern Cleaner	312624-00	
Parts Washer Solution (Heat Treat)	334031-01	11
Autoclave Condensate	449333-00	
Vacuum Heat Exchange Coolant	449334-00	5 (maybe 7)
Neutralized Kolene Overflow	450025-00	
Waste Oil with Water	113554-05	

Unused Product HEAVY DUTY SILICONE MOLD RELEASE NA 1x 55 Gal Drum

No Are all drums and containers marked with a hazardous waste label?
No Are all drums and containers marked with a risk label?
No Are all drums marked with accumulation start date?
Yes Are there any drums that are near, or have exceeded the 90/180-day time frame?
No Are all drums marked with proper waste codes?
No Are all containers closed?
Yes Is all labeling visible and readable?
No Are all drums and containers in good condition, no leaks, dents, or rust?
Yes Is the secondary containment free of cracks or other failures?
No Secondary containment does not have any liquids in it?
No Is their 30 inches of aisle space between rows?

■ WI-840 Precipitant

Oil from FRANKLIN 1/2 Drm

Comments (Describe the actions taken to correct deficiencies noted above, and date action was taken.):_____

_____

Name_____ **Signature**_____ **Date**_____

Facility Waste Inspection Sheet

Safety Equipment

✓ Are all spill kits stocked?
✓ Is the first aid cabinet stocked?
___ Is the emergency shower and eye wash station functioning properly, and properly documented? – Receiving Eyewash Needs Replacement
✓ Is the emergency response information posted near all communication devices?
✓ Are fire extinguishers charged, and properly documented?

Waste Accumulated

Shipping Name	Profile #	Count
Ceramic Material with Sodium Hydroxide	113556-05	8
Ceramic Material with Sodium Hydroxide (Overpack)	113556-05	
Kolene Cleanout Solids	307530-02	1 Tote
Kolene Filters	312429-02	
Non Regulated Quench Oil and Water	312428-02	1
Kolene Overflow Water	341064-00	
Used "MPI" Oil	341063-00	
Used Penetrant	341057-00	
Water Based Coolant Lubricant	301555-02	
Oil/Water from NDT Parts Washer	338491-00	
Oil Contaminated Pads and Rags	332400-00	
Latrix 6200 Wax Pattern Cleaner	312624-00	
Parts Washer Solution (Heat Treat)	334031-01	55 Drum 1111 1111 / + 1 Tote
Autoclave Condensate	449333-00	
Vacuum Heat Exchange Coolant	449334-00	1111 11
Neutralized Kolene Overflow	450025-00	1
Waste Oil with Water	113554-05	11

55 G.1 = 1

UNUSED PRODUCT Heavy Duty Silicone Mold Release 1

↳ Asbestos

NO Are all drums and containers marked with a hazardous waste label?
NO Are all drums and containers marked with a risk label?
NO Are all drums marked with accumulation start date?
Yes Are there any drums that are near, or have exceeded the 90/180-day time frame?
NO Are all drums marked with proper waste codes?
NO Are all containers closed?
NO Is all labeling visible and readable?
NO Are all drums and containers in good condition, no leaks, dents, or rust?
Yes Is the secondary containment free of cracks or other failures?
Yes Secondary containment does not have any liquids in it?
NO Is their 30 inches of aisle space between rows?

Comments (Describe the actions taken to correct deficiencies noted above, and date action was taken.): Currently in process of creating a new waste storage location, consolidating wastes that were stored outside, labeling unknown wastes, picking up overseas wastes, and preparing for shipment.

Name Ben Truscott **Signature** _____ **Date** 10-6-2011

Facility Waste Inspection Sheet

Safety Equipment

___ Are all spill kits stocked?
___ Is the first aid cabinet stocked?
___ Is the emergency shower and eye wash station functioning properly, and properly documented?
___ Is the emergency response information posted near all communication devices?
___ Are fire extinguishers charged, and properly documented?

Waste Accumulated

Shipping Name	Profile #	Count
Ceramic Material with Sodium Hydroxide	113556-05	8
Ceramic Material with Sodium Hydroxide (Overpack)	113556-05	
Kolene Cleanout Solids	307530-02	
Kolene Filters	312429-02	
Non Regulated Quench Oil and Water	312428-02	
Kolene Overflow Water	341064-00	
Used "MPI" Oil	341063-00	
Used Penetrant	341057-00	1
Water Based Coolant Lubricant	301555-02	
Oil/Water from NDT Parts Washer	338491-00	
Oil Contaminated Pads and Rags	332400-00	
Latrix 6200 Wax Pattern Cleaner	312624-00	
Parts Washer Solution (Heat Treat)	334031-01	
Autoclave Condensate	449333-00	11
Vacuum Heat Exchange Coolant	449334-00	
Neutralized Kolene Overflow	450025-00	
Waste Oil with Water	113554-05	

___ Are all drums and containers marked with a hazardous waste label?
___ Are all drums and containers marked with a risk label?
___ Are all drums marked with accumulation start date?
___ Are there any drums that are near, or have exceeded the 90/180-day time frame?
___ Are all drums marked with proper waste codes?
___ Are all containers closed?
___ Is all labeling visible and readable?
___ Are all drums and containers in good condition, no leaks, dents, or rust?
___ Is the secondary containment free of cracks or other failures?
___ Secondary containment does not have any liquids in it?
___ Is their 30 inches of aisle space between rows?

Comments (Describe the actions taken to correct deficiencies noted above, and date action was taken.):_____

_____

Name_____ **Signature**_____ **Date** 8/24/9

Facility Waste Inspection Sheet

Safety Equipment

X Are all spill kits stocked? Ordered $1600 in spill Kit supplies
✓ Is the first aid cabinet stocked?
___ Is the emergency shower and eye wash station functioning properly, and properly documented?
___ Is the emergency response information posted near all communication devices?
___ Are fire extinguishers charged, and properly documented?

Waste Accumulated

Shipping Name	Profile #	Count
Ceramic Material with Sodium Hydroxide	113556-05	16
Ceramic Material with Sodium Hydroxide (Overpack)	113556-05	
Kolene Cleanout Solids 1 (300 gal)	307530-02	
Kolene Filters	312429-02	
Non Regulated Quench Oil and Water	312428-02	1
Kolene Overflow Water	341064-00	
Used "MPI" Oil	341063-00	
Used Penetrant	341057-00	1
Water Based Coolant Lubricant	301555-02	111
Oil/Water from NDT Parts Washer	338491-00	
Oil Contaminated Pads and Rags	332400-00	
Latrix 6200 Wax Pattern Cleaner	312624-00	
Parts Washer Solution (Heat Treat) 2 (250 Tote)	334031-01	
Autoclave Condensate	449333-00	6
Vacuum Heat Exchange Coolant	449334-00	
Neutralized Kolene Overflow Overpack	450025-00	1
Waste Oil with Water	113554-05	

___ Are all drums and containers marked with a hazardous waste label?
___ Are all drums and containers marked with a risk label?
___ Are all drums marked with accumulation start date?
___ Are there any drums that are near, or have exceeded the 90/180-day time frame?
___ Are all drums marked with proper waste codes?
___ Are all containers closed?
___ Is all labeling visible and readable?
___ Are all drums and containers in good condition, no leaks, dents, or rust?
___ Is the secondary containment free of cracks or other failures?
___ Secondary containment does not have any liquids in it?
___ Is their 30 inches of aisle space between rows?

Comments (Describe the actions taken to correct deficiencies noted above, and date action was taken.): _____

_____

Name Ben Truscott **Signature** _____ **Date** July 2

Facility Waste Inspection Sheet

Safety Equipment

- ✓ Are all spill kits stocked?
- ✓ Is the first aid cabinet stocked?
- ✓ Is the emergency shower and eye wash station functioning properly, and properly documented?
- ✓ Is the emergency response information posted near all communication devices?
- ✓ Are fire extinguishers charged, and properly documented?

Waste Accumulated

Shipping Name	Profile #	Count	
Ceramic Material with Sodium Hydroxide	113556-05	IIII III	
Ceramic Material with Sodium Hydroxide (Overpack)	113556-05		
Kolene Cleanout Solids	307530-02		
Kolene Filters	312429-02		
Non Regulated Quench Oil and Water	312428-02		
Kolene Overflow Water	341064-00	IIII	Tote 5
Used "MPI" Oil	341063-00		
Used Penetrant	341057-00		
Water Based Coolant Lubricant	301555-02	1	
Oil/Water from NDT Parts Washer	338491-00		
Oil Contaminated Pads and Rags	332400-00	1	
Latrix 6200 Wax Pattern Cleaner	312624-00		
Parts Washer Solution (Heat Treat)	334031-01	IIII	Tote: 1
Autoclave Condensate	449333-00		
Vacuum Heat Exchange Coolant	449334-00		
Neutralized Kolene Overflow	450025-00		
Waste Oil with Water	113554-05	II	Tote

- ✓ Are all drums and containers marked with a hazardous waste label?
- ✓ Are all drums and containers marked with a risk label?
- — Are all drums marked with accumulation start date?
- — Are there any drums that are near, or have exceeded the 90/180-day time frame?
- — Are all drums marked with proper waste codes?
- ✓ Are all containers closed?
- ✓ Is all labeling visible and readable?
- ✓ Are all drums and containers in good condition, no leaks, dents, or rust?
- ✓ Is the secondary containment free of cracks or other failures?
- ✓ Secondary containment does not have any liquids in it?
- — Is their 30 inches of aisle space between rows?

Comments (Describe the actions taken to correct deficiencies noted above, and date action was taken.): Waste carrier conducted. Marking drums w/ dates end

Name Ben Truslott **Signature** [signature] **Date** 4-26-11

Facility Waste Inspection Sheet

Safety Equipment

X Are all spill kits stocked? can improve
X Is the first aid cabinet stocked?
X Is the emergency shower and eye wash station functioning properly, and properly documented?
Y Is the emergency response information posted near all communication devices?
Y Are fire extinguishers charged, and properly documented?

Waste Accumulated Beyond 1-6-11 Shipment

Shipping Name	Profile #	Count
Ceramic Material with Sodium Hydroxide	113556-05	
Ceramic Material with Sodium Hydroxide (Overpack)	113556-05	
Kolene Cleanout Solids	307530-02	
Kolene Filters	312429-02	
Non Regulated Quench Oil and Water	312428-02	
Kolene Overflow Water	341064-00	
Used "MPI" Oil	341063-00	
Used Penetrant	341057-00	
Water Based Coolant Lubricant	301555-02	
Oil/Water from NDT Parts Washer	338491-00	
Oil Contaminated Pads and Rags	332400-00	
Latrix 6200 Wax Pattern Cleaner	312624-00	
Parts Washer Solution (Heat Treat)	334031-01	
Autoclave Condensate	449333-00	
Vacuum Heat Exchange Coolant	449334-00	
Neutralized Kolene Overflow	450025-00	
Waste Oil with Water	113554-05	

Y Are all drums and containers marked with a hazardous waste label?
N Are all drums and containers marked with a risk label?
N Are all drums marked with accumulation start date?
Y Are there any drums that are near, or have exceeded the 90/180-day time frame?
N Are all drums marked with proper waste codes?
Y Are all containers closed?
Y Is all labeling visible and readable?
N Are all drums and containers in good condition, no leaks, dents, or rust?
Y Is the secondary containment free of cracks or other failures?
Y Secondary containment does not have any liquids in it?
NA Is their 30 inches of aisle space between rows?

Comments (Describe the actions taken to correct deficiencies noted above, and date action was taken.):_____

_____

Name Ben Truscott **Signature** _____ **Date** 1-5-11

Attachment E: Accumulated Waste Log

SeaCast, Inc. – Marysville

Accumulated Waste
Last printed 9/7/2011 10:04:00 AM

Shipping Name	Profile #	Count	
✓ Ceramic Material with Sodium Hydroxide	113556-05	8	(55 g-l)
Ceramic Material with Sodium Hydroxide (Overpack)	113556-05		
Kolene Cleanout Solids/Liquids	307530-06		
Kolene Filters	312429-02		
Non Regulated Quench Oil and Water	312428-06		
Kolene Overflow Water	341064-01		
Used "MPI" Oil	341063-02		
✓ Used Penetrant	341057-04	2	(55 g-l)
✓ Water Based Coolant Lubricant	301555-06	2	(55 g-liter) (33 g
Oil/Water from NDT Parts Washer	338491-00		
Oil Contaminated Pads and Rags	332400-02		
Latrix 6200 Wax Pattern Cleaner	312624-00		
Parts Washer Solution (Heat Treat)	334031-01		
Colloidal Silica	327926-01		
Used Brine Quench	415385-02		
Autoclave Condensate	449333-01		
Neutralized Kolene Overflow Sludge	450025-01	1	(55 g-l)
Water with Parts Washer Solution (spill cleanup)	507004-00		
Vacuum Heat Exchange Coolant	449334-01		
Waste Oil with Water	113554-06		
16% VOC Glycol Quench and water			
Asbestos			

Attachment E: SeaCast, Inc.
WAD 981769805
2012 RCRA CEI Inspection

Attachment F:

E-mail dated February 24, 2012, from Truscott to Boller and Williams

SeaCast corrective actions
Ben Truscott
to:
Jack Boller, CherylB Williams
02/24/2012 04:59 PM
Hide Details
From: "Ben Truscott" <bent@seacast.com>

To: Jack Boller/R10/USEPA/US@EPA, CherylB Williams/R10/USEPA/US@EPA

Jack and Cheryl,

It has been almost 4 weeks since your visit to our facility, and I wanted to send you a quick update as to our progress towards the items needing addressing that you mentioned when here.

Designation of Sandblaster Waste Sand: We have sent out samples for TCLP of the RCRA 8 for samples from various sandblasters and dust collector, and are waiting lab results

Past 90 day accumulation: We are having all of our past-90 day accumulated waste being sent out within the next few weeks. Emerald services was contracted to come and lab pack, and designate various wastes stored in our hazardous waste area. PSC has been contracted to remove all of our previously profiled waste.

Communication in waste area: We have installed a radio in the hazardous waste storage area.

Fluorescent tubes: we have labeled all the fluorescent tube boxes with universal waste labels, and will have them all shipped in the next few weeks.

30" aisle space: once our accumulated wastes have been removed we will create permanent aisles with 30" aisle space, and will be shipping out wastes regularly so that build up beyond the designated space does not occur

We are still working on setting up regular cleanings of the acid room, and streamlining our inspection process. I will send evidence of completion when finished.

If you have any further questions or comments, please feel free to contact me.

Best Regards,

Ben Truscott
SeaCast, Inc.
6130 31st Ave NE
Marysville, WA 98271
Phone: 360-653-9388
Direct: 360-474-5149
Fax: 360-653-6044
bent@seacast.com

Attachment F:
Seacast, Inc
WAD 981769805
2012 RCRA CEI Inspection